# POLICIES AND PROCEDURES MANUAL

## GOVERNMENT OF THE DISTRICT OF COLUMBIA

### OFFICE OF JUSTICE GRANTS ADMINISTRATION
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## Mission

The Offices of Justice Grants Administration and Victim Services are State-Administering Agencies (SAAs) that secure and manage Federal grant funds to governmental and community-based organizations that improve the quality of life for citizens of the District of Columbia.

## Purpose

The Office of Justice Grants Administration (OJGA) Policies and Procedures Manual outlines the practices, policies, and procedures currently in effect for the implementation of Federal and private grants awarded to the District of Columbia and managed by OJGA.

This manual provides a generic overview of the basic requirements for the programmatic and financial operations of grants awarded to the District. This manual is intended as a resource for agency program managers as they develop and implement grant programs. This manual should be used as a supplement to - but not a replacement for - specific directives and requirements issued by grantors.

This manual will be updated continually to reflect changes in official policies and procedures adopted by the Government of the District of Columbia.

# Application Development and Submission

It is the responsibility of the program manager to develop and submit grant applications in accordance with the terms and conditions outlined in the grant application announcement.  Following are some standard guidelines and timelines required for the successful development and submission of an application.

## A.    Prepare Federal Grant Application

1. Assess the application requirements, including: the research and data collection that is needed, the available and required resources, and the necessary coordination and collaboration of various parties.

2. Develop the application based upon approval from the authorized State Administering Agency (SAA) and based on the Notice of Funding Availability (NOFA) from the Federal government.  The application should include all required activities and tasks, including but not limited to, required cover letter, checklist application page, certifications, assurances, budget, and programmatic and budget narrative.

3. Complete draft application within a timeframe that allows for adequate review prior to submission to the applicable director for review.

4. Prepare a copy of the grant proposal to be submitted to US Department of Justice (USDOJ) Office of Justice Programs (OJP) and forward a copy to the District's Single Point of Contact (SPOC) to comply with Executive Order 12372, SF-424.

5. Include the date submitted to the SPOC on the Federal Application SF-424, Item #16.

6. Upon review by the SPOC, the application is now ready for submission to the Federal government.

7. Upon the director's approval, forward application to OJP contact person or through the Grants Management System (GMS), as instructed in the application announcement.

8. Place a copy of the application in the newly created grant file.

[1]The Federal government will notify the appropriate SAA regarding the approval or denial of the grant application and any special conditions that may apply.

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[1] Notification via Grants Management System.

## B.    Timeline Requirements

Grant application announcements stipulate whom in the jurisdiction or agency must sign and submit the grant application.  Allocate enough time to plan, coordinate, research, write and edit the application.  Following is the required time-line for submitting applications for review, approval and signature prior to the application submission deadline.

Director (OJGA)            3 days
SPOC                       2 days
Deputy Mayor               7 days


EXAMPLE:  If an application is to be signed by the Mayor, the following timeline must be implemented:

Application Development    20 days/month
D/OJGA                     3 days (prior to DM review)
SPOC                       2 days (prior to Mayor Review)
Deputy Mayor               5 days (prior to Mayor Review)
Mayor                      10 days (prior to submission deadline)


Application should be ready at least 15 days prior to the submission deadline.

# Grants Management

This section will discuss the components of grant management, including: Grant Award Notice, development of project and spending plan, sub-grant process, record maintenance and organization of grant files, Federal reporting requirements, monitoring and site visit, corrective action plan and grant close out.

## A.    Notice of Federal Grant Award

Upon the complete review of the application, OJP will notify the District via a Grant Award Notification (GAN).  The GAN will include:

1. Legal authorities that govern the award;
2. Public policy issues affecting the grant award,
3. Cost-sharing/matching requirements,
4. Program income and grant terms and conditions.

The Program Manager will:

1. Review the award to determine if the award should be signed or a letter should be sent identifying issues of concern, or provide a counter offer.
2. Prepare an acceptance award letter.
3. Submit two copies for the director's signature.
4. Submit an acceptance response to BJA/OJP and retain a copy in the grant file.
5. Review the award to determine the match requirement.
6. Provide the budget analyst with a copy of the award.
7. Provide the budget analyst with a copy of any adjustments to the award.

The Budget Analyst will:

1. Submit the Grant Adjustment Notice (GAN) and spending plan to the Office of Finance and Resource Management (OFRM).

2. OFRM submits the Grant Notification to the Office of Budget and Planning (OBP).

3. OBP requests budget approval from the City Council.

4. Upon approval of the budget for the award, OBP notifies the budget analyst and OFRM of the approval via email.  OFRM loads the award and spending plan into DC's System of Accounting and Reporting (SOAR).

5. If there is a change in the amount of the award, the budget analyst submits the new award amount with an updated spending plan to OFRM. OFRM reviews the information and forwards it to OBP. OBP then submits the information to the Deputy Chief Financial Officer. Once approved, an email is sent to the budget analyst and OFRM. OFRM updates this information in SOAR.

6. If the project period changes, the program manager provides a copy of the federally approved GAN to the director and the budget analyst. The budget analyst contacts OBP and provides them with a copy of the GAN and makes, if needed, the appropriate budget modification requests.

## B.  Project Plan

Based on the application, (activities required under the approved grant application, award terms and conditions) the program manager determines how the grant funds should be awarded.

1. Compete funds
2. Distribute funds as determined by Federal entities
3. Sole-Source

## C.  Spending Plan

A spending plan is used to identify the planned budget and spending per quarter of each fiscal year of a grant program, and is used to establish a grant's annual budget in the District's SOAR system.

1. A spending plan should be developed in connection with the general activities identified in the grant application and project plan.
2. The spending plan should be developed for every new grant and all active grants each fiscal year.

## D.  Grant Award Profile

In order for a new grant to be captured by the District's grant tracking mechanism and to enable budget authorization, a Grant Award Profile (GAP) must be completed for each new grant. The GAP is a form used by the District to identify a grant by recipient agency, Federal grantor, application and award instrument, and financial data.

The program manager should apply the following guidelines, upon acceptance of a new grant award, and each fiscal year thereafter until grant closeout, to establish a grant annual budget:

1. Complete GAP form and spending plan.
2. Attach a copy of the grant award and supporting documentation.
3. Sign GAP form as the program manager.
4. Submit package to financial officer, OJGA/OVS for review and budget authorization.
5. Request a copy of the signed package from the financial officer for your file.

## E.    *Sub-granting to Private Organizations*

The policy of the District government requires that all sub-grants to private organizations be awarded on a competitive basis. There are exceptions to this process.  Refer to published guidelines in the DC Register for complete process. [2]Refer to Administrative Regulations and Requirements at OMB Circulars A-102 and A110.

1. Review the application and special conditions, laws and statutes.
2. Prepare and submit a Notice of Funding Availability (NOFA) for publication in the Office of Partnerships and Grants Development (OPGD) Funding Alert, and DC Register to notify the public of intent to make grant funds available via competitive solicitation or Request for Application (RFA).
3. Make public announcement in a minimum of one other medium (for a total of three).  This can be announced in a local newspaper, community newsletter, or direct mailing.

Prepare an RFA package that includes:

1. Background/general information
2. Availability of funds and award limits
3. Eligibility criteria
4. Eligible program activities
5. Restrictions in use of funds
6. Request for program goals, objectives, activities, performance measurement, reporting and evaluation plan
7. Application review criteria
8. Application deadline
9. Proposal instructions
10. Checklist of application requirements

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[2] 2 CFR 215 (Formerly OMB Circular A-110 Uniform Administrative Requirements for Non-Profit Organizations). OMB Circular A-102 for State and Local Governments.

11. Attachments (Applicant profile/forms/certifications, assurances, budget, spending plan, etc.)
12. Submit to the Director OJGA for approval
13. RFA should be solicited for at least 30 days to enable a positive response rate of applications.

The RFA shall contain contingency clauses stating that:

1. The agency reserves the right to make changes to the RFA, based on any clarifications in the regulations, legislative changes, or funding level fluctuations.

2. Funding for the sub-grant is contingent on continued funding from the grantor. The RFA does not commit the agency to award a sub-grant.

3. The agency reserves the right to accept or reject any or all applications if the agency determines it in the best interest of the agency to do so. The agency will notify all applicants of the rejected proposals.

4. The agency reserves the right to issue addenda and/or amendments subsequent to the RFA process.

5. The agency shall not, in any event, be liable for any costs incurred in the preparation of applications in response to RFA. Applicant agrees that all costs incurred in developing the application are the applicant's sole responsibility.

6. The agency may conduct pre-award on-site visits to verify information submitted in the application, to provide technical assistance, and to determine if the proposed facilities are appropriate for the proposed services to be provided.

7. The agency may require the applicant to enter negotiations, and to submit a price, technical or other revision of their proposal that may result from negotiations.

8. If there are any conflicts between the terms and conditions of the RFA and any applicable Federal or District law or regulation, or any ambiguity related thereby, then the provisions of the applicable law or regulation shall control and it shall be the responsibility of the applicant to ensure compliance.

As part of the application packet, the applicant shall submit a Statement of Certification, signed by the duly authorized officer for the applicant's organization that states:

1. The individuals, by name, title, address, and phone number who are authorized to negotiate with the agency on behalf of the organization;

2. That the applicant is able to maintain adequate files and records and can meet reporting requirements;

3. That all fiscal records are kept in accordance with Generally Accepted Accounting Principles (GAAP) and account for all funds, tangible assets, revenue, and expenditures;

4. That the applicant is not proposed for debarment or presently debarred, suspended, or declared ineligible, as required by Executive Order 12549;

5. That the applicant complies with the provisions of the Drug-Free Workplace Act;

6. The applicant shall provide a copy of the most recent and complete set of audited and/or financial statements available for their organization. If audited and/or financial statements have never been prepared due to the size or newness of the organization, the applicant must provide, at a minimum, an Organizational Budget, an Income Statement (or Profit and Loss Statement) and a Balance Sheet certified by an authorized representative of the organization.

7. Applicant is informed about agency matching requirements, if applicable.

## F.    *Sub-grant/Exception to Competitive Process*

Sub-grants to private organizations shall be awarded on a competitive basis. Exceptions are as follows:

1. An agency may make an award on a sole source basis in appropriate circumstances. These circumstances include, but are not limited to situations where:  (a) the award of the grant designates the sub-grant recipient; (b) the Federal law defines eligibility in such a way that there is only one eligible applicant, or (c) there is a recognized coalition of service providers through which the broadcast community participation may be obtained in serving the targeted clientele.

2. An agency may make an award to an unsolicited proposal if: (a) the agency has un-obligated funds remaining from the grant due to unusual and unanticipated factors; (b) the applicant has a program or project that clearly furthers the purpose of the grant, (c) the proposal reflects proprietary skills or technology that are limited in availability, and (d) the applicant brings to the total grant program matching resources (cash or in-kind) equivalent to at least thirty percent of the grant assistance requested.

## G.     Review Panel (Refer to Published Guidelines)

1. Simultaneous to the NOFA, and before the closing date, the program manager must organize the competitive process beginning with the recruitment of a review panel.
2. OJGA maintains a list of qualified reviewers from which reviewers may be selected.
3. A letter of interest and an application should be on file.
4. Nominate reviewers with specialized areas of expertise applicable to the particular RFA.
5. A minimum of three (3) reviewers is required to review each application. An alternate reviewer should be on hand for back-up purposes.
6. Develop a confirmation letter for the panelist.
7. Attach a copy of the RFA and the Scope of Work for Review Process to be signed and returned to the program manager along with a resume.
8. Submit the names and resumes of recommended panelists to the Director of OJGA and/or designee for approval.
9. Schedule a meeting place.
10. Convene panel for orientation, review the RFA, grant guidelines and special conditions, procedures and scoring instruments.
11. Complete W-9 and set-up payments for reviewers (if appropriate) through invoice.
12. Panelists may take grant applications home, or review on site.
13. Monitor the review process.
14. Program manager should require panelists to discuss specific proposals when scores differ by more than 30 points.
15. Once completed, compile scores of each reviewer and determine average score.
16. Maintain file with all original applications, score sheets and review sheets from the RFA process.
17. Recommendations of the review panel are advisory only.
18. Final decision to fund programs rest solely with the director or agency head.

## H.     Agency Responsibility after Award

Before the agency issues the award documents to successful applicants, it shall notify in writing each applicant whose application was not selected for award. This notification may include copies of the reviewer's evaluation and comments.

The agency shall establish official records of awarded sub-grant files and retain the records of all awarded applications and subsequent reports for the period required by Federal and District guidelines for grant records.

The three-year retention period starts from the date of the submission of the closure of the single audit report, which covers the grant period. If any litigation, claim, negotiation, audit, or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues which arise from it or until the end of the regular three-year period, whichever is later.

After the three-year retention period, District regulations require archival retention for an additional four years. Records shall be maintained of unsuccessful applications for one year from the date that the RFA is closed.

Refer to Monitoring Guidelines for information on post-award monitoring requirements.

## I.   Sub-Grant/Certification Competitive Review Package

The Office of Budget and Planning must certify package for application and competitive processes prior to being announced to sub-grantees. The following information must be compiled and sent for review:

1. List of proposed awards.
2. Copy of NOFA from DC Register.
3. Copy of the RFA.
4. Name of review panelists with signed affidavits.
5. Individual aggregate scores and recommendations.
6. Justifications for awards not consistent with review panel scores.

## J.   Sole Sourcing

This process is used when granting to a government agency or a non-profit organization that is the only eligible entity offering the required service.

1. Review Federal and District regulations/statutes to determine if sole source is authorized.
2. Identify governmental organizations having similar need/interest, financial support requirements and commitment in addressing the objective.
3. Government agencies will submit program proposals.
4. OJGA staff will review and evaluate the proposal with the same rigors used to evaluate competitive proposals.

5. If proposal is approved, OJGA will prepare Sub-grant Agreement, Grant Award, MOU and Intra-District documents.
6. Prepare a sole source justification and submit to the director.
7. Upon receipt of the signed award document, place a copy in the file.
8. Give a copy to the budget analyst to be submitted for entry into the SOAR

## K.   Unsolicited Proposals

Proposals submitted without the announcement of a NOFA may be reviewed for processing if there are funds available at the end of the competitive process or non-competitive funds are available.

1. Review the goals and objectives of the application.
2. Determine the impact upon other agencies involved.
3. Identify unmet objectives that may have priority status.
4. Evaluate the proposals with the same rigors used to evaluate competitive proposals.
5. Develop the award.

## L.   Sub-granting Process

After the decision and approval is given to award funds, the program manager prepares the sub-grant award documents and submits the package to director for approval and signature before sending to the sub-grantee.

The sub-grant award documents shall subject the sub-grantee to the same conditions and guidelines that apply to the original grant.

The sub-grant package should include:

◊ Cover Letter
◊ Sub-grant Award Form:
   ▪ Recipient
   ▪ Award Period
   ▪ Budget Allocation

◊ Memorandum of Understanding (MOU) and Intra-District Forms if the sub-granting agency is a DC agency or a non-umbrella agency.

◊ Sub-grant Agreement includes:
- Type of services to be provided
- Expenditure and payment provision
- Financial management and audit
- Matching (if applicable)
- Programmatic and Financial reporting requirements
- Compliance and Assurances
- Record and monitoring
- Grant period
- Termination

The program manager will provide budget analyst with:

◊ Copy of Sub-grant Award and Spending Plan.

## M. Payment Method

It is the responsibility of the program manager to be familiar with the sub-grantee's payment requirements. There are two forms of reimbursable payments OJGA may use unless otherwise authorized by the granting agency.

◊ Check
◊ Intra District

Advance payments will not be disbursed.

## N. Payment Method Process

1. Grantee Request for Funds (GRFF) (Refer to Sample Copy)

   a) Budget analyst/designee will notify the program manager that a sub-grant is established in SOAR.

   b) Program manager shall inform the sub-grantee that payment will be generated according to the sub-grant budget and spending plan.

   c) When the sub-grantee is ready for payment, the organization must submit a GRFF, along with invoices and supporting documentation in accordance with the expenditure and spending plan.

   d) Program manager is responsible for reviewing all documents to ensure authenticity, and verify that expenditures are authorized under the terms of the grant.

e) Program manager verifies the information to be correct and complete.

f) If corrections are necessary, the program manager will contact the sub-grantee to certify adjustments/changes to the GRFF as required.

g) Administrative portion of the form should be completed and signed by the program manager.

h) GRFF invoices and/or supporting documents are submitted to the director for authorization to pay.

i) Program manager forwards the GRFF to the budget assistant, who then processes the request.

j) Budget assistant forwards the approved GRFF to the Office of Finance and Resource Management (OFRM) for payment.

k) Program manager can request a "hold for pick up" on payment checks with the budget analyst/designee.

l) Budget assistant will notify the program manager of the availability of the check.

m) Program manager will notify the sub-grantee of the check availability and schedule pick up between sub-grantee and OFRM.

n) Check pick-up will be governed by OFRM's documented process.

2. Grantee Equipment Purchases

a) The program manager is responsible for obtaining all invoices for equipment purchased by sub-grantees along with a completed Equipment List Form, on a quarterly basis (at the same time as submittal of other expenditures, quarterly programmatic and financial reports). The program manager can then complete and issue equipment "label (s)" to the sub-grantee and update the OJGA Equipment Inventory Folder (on the "K" drive).

b) Equipment as defined by USDOJ/OJP is "tangible non-expendable personal property having a useful life of more than one year and an acquisition cost of $5,000 or more per unit".

## O.    Intra-District Process

The Intra-District process of payment is used for a sub-grantee operating within the District's SOAR system.  This payment process transfers funds electronically.  Complete the following forms:

◊  Sub-grant Award and Sub-grant Agreement
◊  Memorandum of Understanding  (MOU)
◊  Intra-District Request Form Part I and II (IDRF)

Submit to director for approval.  Submit to sub-grantee for signature.  Once signed by agency, submit to the director for signature.  Ensure the IDRF states this is for encumbrances only when setting up full award amount.

Package the above referenced documents and have budget analyst complete seller section of IDRF II.  Copy of all documents returned to the program manager.


## P.    Grant Award Profile

In order for a new grant to be captured by the District's grant tracking mechanism and to enable budget authorization, a Grant Award Profile (GAP) must be completed for each new grant.  The GAP is a form used by the District to identify a grant by recipient agency, Federal grantor, application and award instrument, and financial data.

The following guidelines should be applied by the program manager upon acceptance of a new grant award and each fiscal year thereafter until grant close-out, to establish the grant annual budget.

◊  Complete GAP form and spending plan.
◊  Attach copy of the grant award and supporting documentation.
◊  Sign GAP form as the program manager.
◊  Submit package to budget analyst for review and budget authorization.
◊  Request copy of the signed package from the budget analyst and maintain a copy for your record.

## Q.  Documentation and Record Keeping

Proper grant documentation is essential in project management and to ensure compliance with grant administrative and programmatic requirements, as required by [3]OMB Circulars A–87 and A-102 Grants and Cooperative agreements with State and Local Governments. [4]Use of the Grants Tracking System as required.

1. Grant recipients must retain records pertaining to an award three years after the date of submission of the closure of the single audit report, which covers the grant period.

2. Make these records available for review upon request by DOJ.

3. It is the responsibility of the program manager to maintain all grant and sub-grant files, as well as a list of equipment purchased by each sub-grantee.

4. These files will contain programmatic and financial records related to the sub-grant.

## R.  Reporting

Programmatic and financial reports are required by the DOJ.   It is the responsibility of the program manager to complete all progress reports by or prior to the required due date.

The standard progress report used by DOJ is the Categorical Assistance Progress Report.  This report is to be submitted on a quarterly, semi-annual or annual basis as stipulated by the grant.  The program manager is responsible for identifying the reporting required by a grant program.   Reporting requirements can be found in the application announcement kit or the award terms and conditions.

Program Manager shall:

1. Review programmatic reporting requirements for the grant program.
2. Write report to allow time for review and edit of work.
3. Submit draft report to OJGA Director.
4. If necessary, revise and resubmit report to OJGA Director.
5. Upon approval, submit report to the DOJ contact person identified in the report guidelines.
6. Place a copy of the report in the grant file.

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[3] OMB Circulars A-87/A-102-Cost Principles/Grants and Cooperative Agreements for State and Local Gvt.
[4] Agency Grants Tracking system.

The Financial Report (SF 269A) is to be completed by the budget analyst on a quarterly basis and must be submitted forty-five (45) days after the end of each quarter.

1. It is the responsibility of the director to ensure that the financial report is being submitted in a timely manner.
2. A copy of each report should be given to the program manager and provided to Financial Manager, OFRM.
3. Copy is placed in the grant file.
4. The SF269A shall be reviewed by the applicable director prior to submission to DOJ.

## S.    Monitoring Sub-grants and Contracts

It is the responsibility of the program manager to monitor sub-grants and contracts to ensure compliance with Federal laws, program regulations and administrative requirements, as well as specific sub-grant and/or contracting terms and conditions included in the sub-grant and contract.

Monitoring methods include:

◊ Frequent phone conversations
◊ Face-to-face meetings
◊ Quarterly programmatic reports
◊ Financial status reports and payment requests
◊ Site visits
◊ Audits

Program Manager shall:

1. Maintain frequent phone contact and face-to-face meetings with sub-grantee.
2. The frequency will depend upon the nature and complexity of the sub-grant, and the reputation and demonstrated capabilities of the sub-grantee to adhere to programmatic and financial requirements.
3. In general, it is advisable to maintain contact on a minimum quarterly basis.
4. Review quarterly programmatic and financial reports as submitted on a quarterly basis.
5. Communicate with the sub-grantee regarding questions or concerns that arise as a result of the review.  Work to resolve issues and assist sub-grantees in their efforts to comply with requirements.
6. Upon receipt of the Grantee Request for Funds (payment), review against the sub-grant award, financial reports and expenditures to ensure allowable costs prior to authorization of payment.

7. The program managers' signature will be required to authorize payment and; therefore, a thorough review of all expenditures is required.
8. A minimum annual site visit is required for each new sub-grant. (Refer to site monitoring tools in appendix).
9. More frequent site reviews will depend upon the nature and complexity of the sub-grant, and the demonstrated performance of the sub-grant recipient to adhere to programmatic and financial requirements.

## T.    Corrective Action Plans

When a sub-grant is not being implemented according to the award and agreement, it is the responsibility of the program manager to work with the sub-grantee to develop a corrective action plan. Once the plan is developed, it must be submitted to the applicable director for review and approval prior to implementation:

1. The sub-grantee will be notified by OJGA in writing that there are concerns that the conditions of the grant are not being met. OJGA will outline specific areas that must be addressed. It is then incumbent upon the sub-grantee to provide a corrective action plan with a specific timeframe for addressing the areas of concern that is acceptable to the agency.

2. In the event the sub-grantee's corrective action plan is not immediately activated and the deficiencies are not remedied, OJGA will perform an on-site audit and make specific recommendations that address compliance within a given time frame.

3. If the sub-grantee does not satisfy these required conditions by the end of the allocated time frame, funding will be terminated.

## U.    Administrative Budget

It is the responsibility of the budget analyst, and applicable director to ensure that all costs charged to the administrative budget of a grant comply with the grant program's Federal rules and regulations.

## V.    Sub-grant Extension/Adjustment

A sub-grant extension is a request to extend the grant beyond the original grant period. Sub-grant extensions must be requested 90 days prior to the end of the original grant period. The extension may not exceed 12 months.

Prior to approving sub-grant extensions, program manager must check with budget analyst. If budget exist for specific grant and time frame, budget analyst must initial approval prior to program manager's approval of request. If budget does not exist for specific grant and the budget analyst can request a modification to cover extension, program manager must get sign-off from the budget analyst and director prior to approval of extension.

If budget does not exist for specific sub-grant, or budget analyst cannot get approved budget modification, the sub grantee's request for an extension must be rejected by program manager.

A grant extension may be requested for the following reasons:

1. Delay in programming.
2. Extraordinary Circumstances.
3. Special Conditions.
4. Delay in receipt of funding.

For grant adjustments, the sub-grantee must obtain prior written approval from JGA for **all** desired changes to the applicable Sub-grant Award. [5]Requests for reprogramming of funds and changes to the project's goals and objectives received toward the end of the third (3rd) quarter of the fiscal year will only be considered for extenuating circumstances determined appropriate by the JGA Program Manager.

## W. *Certifications regarding Debarment, Suspension, and Other Responsibility Matters.*

Certification must be completed prior to recommendation for or against an award. The government-wide common rule for debarment and suspension, 28 CFR Part 67, provides guidance on requirements that recipients shall meet in order to receive Federal funds. (Refer to Epls.Arnet.gov). Please refer to DOJ Website at www.ojp.usdoj.gov.

1. Title 28 of the Code of Federal Regulations (CFR), Part 67, provides that executive department agencies shall participate in a system for debarment and suspension from programs and activities involving Federal financial and non-financial assistance and benefits. Debarment or suspension of a participant in a program by one agency has government-wide effect. It is the policy of the Federal government to conduct business only with responsible persons, and these guidelines will assist agencies in carrying out this policy.

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[5] All 4th quarter requests for reprogramming will be reviewed by the director of OJGA.

2. Lobbying, as required by Section 1352, Title of the U.S. Code, and implemented at 28 CFR Part 69, for persons entering into a grant or cooperative agreement over $100,000, as defined at 28 CFR Part 69.

3. Drug-Free Workplace (Grantees other than individuals), as required by the Drug-Free Workplace Act of 1988, and implemented at 28 CFR Part 67, Subpart F, for grantees, as defined at 28 CFR Part 67 Section 67.615 and 67.620.

## X.    Close Out

The following is a description of the Federal closeout requirements, including reports, disposition of property, settlement of accounts and no-cost extensions:

1. Review all grant program requirements to ensure they have been met.
2. Review all sub-grants and contracts to ensure all program and financial requirements have been met and that the expenditures are allowable, allocable, and reasonable.
3. Submit required final progress report(s).
4. The budget analyst will submit required final financial report(s) (269A).
5. Review grant file to ensure that all required documentation, records and OJGA closeout form is completed and reviewed by the applicable director are properly filed for future audit purposes.

## Y.    Time and Effort Record of Federal Funds

If an employee's time and effort has to be allocated across multiple grants, the employee must utilize the District's Time and Effort Process and associated forms, which are maintained on OJGA G-drive, to record the time and effort expended on each of the specific grants.

In order to recover salary dollars associated with time and effort the obligation must have been made prior to the close of a grant's period of performance, any time and effort charges associated with the grants' liquidation period is prohibited.  Please refer to the OJP Financial Guide at http://www.ojp.usdoj.gov/FinGuide/

## Z.    Audit Requirements and Guidance

The Federal government is responsible to Congress and the taxpaying public for efficient and effective use of Federal funds.  OMB Circular A-133 implements the Single Audit Act, as amended, 31 USC 7501-7507.  OMB's final revisions to

Circular A-133 increased the threshold of $500,000 expended as the requirement for a single audit.

OJGA receives an audit each year by independent, non-federal auditors on internal controls, and compliance with laws and regulations governing Federal awards. The audit is viewed as a tool that raises relevant or pertinent questions rather than as a document that answers all questions. If the audit identifies problems, OJGA must work with the auditor on corrective action to ensure that Federal funds are protected.

Fiscal administration of the sub-grant shall conform to generally accepted accounting principles recognized by the Financial Accounting Standards Board, set forth in the April 1997 edition of the DOJ Office of the Comptroller Financial Guide (web site above).

It is the responsibility of the sub-grantee to closeout the sub-grant accounting records at the end of the project, and submit a grant closeout report, using the format used for quarterly programmatic reports.

## *SUB-GRANT CERTIFICATION FORM (OJGA -1)*

*This form outlines the four basic requirements that must be met for the sub-granting process to be used in the District of Columbia.*

*Section I: Federal Authorization*
___The use of the sub-grant process is authorized by the Federal grant.  Agencies should attach documentation that shows Federal authorization, which could include enabling legislation, program regulations, or written approval from the Federal project officer.

*Section II: Service Beneficiary*
___The benefits of the services or activities supported by the sub-grant(s) will accrue directly to the operations of the sub-grantee organization and/or its constituents, rather than directly to the operations of the granting District agency.  Agencies should attach supporting documentation (federal program regulations or agency grant application) that identifies target population to be served.

*Section III: Need-Based Criteria*
___The evaluation process will consider as a major evaluation criterion the quality of the applicant's description of and/or its constituents' needs and how meeting those needs will serve the objectives of the grant program.

*Section IV: Grantee-Defined Service Provision*
___The Request for Applications (RFA) will enable the applicant, not the District grantor agency, to choose the specific types and levels of service to be performed from an array of eligible activities under the Federal grant program.

| | |
|---|---|
| Submitted by Agency Director | Date |
| Received by the Office of Chief Procurement Officer | Date |
| Approved by Office of the Chief Procurement Officer | Date |
| Received by the Office of Justice Grants Administration | |
| | Date |

COMMENTS:

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE CITY ADMINISTRATOR
OFFICE OF JUSTICE GRANTS ADMINISTRATION

### *SUB-GRANT COMPETITIVE REVIEW FORM (OJGA)*

The District of Columbia government is committed to maximum competition when making sub-grant awards with Federal funds.  The Office of Justice Grants Administration will review all proposed sub-grant awards to ensure a competitive process.

___Sub-grant Certification Form (JGA)

___Summary of proposed projects, sub grantees, and award amounts

___Copy of the Notice of Funding Availability (NOFA) from the D.C. Register

___Copy of the Request for Applications (RFA)

___Names of the evaluators and copies of their conflict of interest certification forms

___Scoring worksheets for applications received in response to the RFA

| | |
|---|---|
| Submitted by Agency Director | Date |

| | |
|---|---|
| Approved by the Office of Budget and Planning | |
| | Date |

COMMENTS:

Additional Approval for Non-Competitive Awards (Attach written justification on separate sheet)

| | |
|---|---|
| Approval by the Chief Financial Officer | Date |

| | |
|---|---|
| Approval by the Chief Management Officer | Date |

## *DEFINITIONS*

**AGENCY** - District agency that awards a sub-grant.

**CFDA –** Catalog of Federal Domestic Assistance

**CFR** – Code of Federal Regulations

**EPLS** – Excluded Parties List System

**GRANT –** Federal funds received from which the agency makes sub-grant awards.

**GRFF –** Grantee Request for Funds

**IDRF -** Intra-District Request Form

**MOU -** Memorandum of Understanding

**NOFA or Notice of Funding Availability -** Public notice that an agency will issue a Request for Applications, informing interested parties when and where the Request for Applications may be obtained.

**OJGA –** Office of Justice Grants Administration

**Request for Applications -** Document that describes the requirements for sub-grant applications.

**Review Panel** - Team of qualified individuals responsible for reviewing, scoring and recommending applicants for sub-grant awards.

**Sub-grant Award** - Commitment of funds from a grant by an agency to a governmental or private organization to support specific services and operations.

**Sub-grant Certification Form or SCF** - Certification by an agency that a grant qualifies for sub-granting.

**Sub-grant Officer –** An agency official authorized to execute sub-grant awards for the agency.

**Sub-grant Competitive Review Form or SCRF -** A transmittal form for submitting proposed awards for review and approval by the Office of Budget and Planning.

## REFERENCES

US Department of Justice
Office of Justice Programs Financial Guide
Office of Management and Budget
Office of Grants Management and Development
Office of Chief Financial Officer
Management Concepts Incorporated
Office of Justice Grants Administration